

RONALD SULLIVAN LAW, PLLC

Ronald S. Sullivan Jr.

July 30, 2024

BY ECF

The Honorable Vera M. Scanlon
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 112011

Re: U.S. v Calos Watson; Bail Hearing

Dear Judge Scanlon:

This morning, undersigned counsel had detailed discussions with qualified appraisers in Virginia. As it turns out, a fulsome appraisal (different from a realtor's "desk appraisal") would take at least two weeks and perhaps longer. We are advised that an appraiser would have to complete, among other things, a soil quality report, an evaluation for septic system readiness, a land survey, an evaluation of zoning requirements, road frontage determination, and timber quality evaluation to name a few aspects that need to be considered.

After undersigned counsel advised the family of the situation and given the serious safety concerns that we enunciated to the Court at side bar at the July 26 hearing, more friends and family of Mr. Watson have stepped forward to supply additional security in an effort to expedite a decision. In addition, an existing guarantor, Allison Wallace-Estes, increased her asset commitment. The net result of these supplements to the package is that no matter how the Court decides to value the Virginia land, the bail package will still secure the bond with approximately \$1m worth of assets and the moral suasion evidenced by additional loved ones offering up their assets is even stronger.

Specifically:

- Dr. Jacqueline Mattis (close family friend/Dean of Faculty, School of Arts and Sciences, Rutgers Newark) pledges \$513,420.35. This includes the full value of her TIAA Cref retirement account at \$363,420.35 and her Ameriprise Investment portfolio, valued at \$150,000.

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- Allison Wallace-Estes agrees to increase her home equity from \$50,000 to \$100,000 for a net \$50,000 increase.
- Amy Troner (close family friend from childhood) pledges \$73,019.00 (\$13,386.00 from Fidelity account and \$59,633.00 from her Vanguard IRA account)

Accordingly, even if the Court were to accept the government's tax assessment as the land's valuation at \$106,000 (which, of course, does not come close to an accurate valuation), friends and family of Mr. Watson have come together to close the delta between the defense and government's valuation. The defense offers a \$750,000 valuation of the land. The government offers a \$106,000 valuation of the land, leaving a delta of \$644,000. The combined pledges of Dr. Mattis, Ms. Wallace-Estes, and Ms. Troner add up to \$636,439.35. The net result is the same. And the court does not have to wait an additional two weeks for an appraisal to come in to evaluate the bail package.

Since we were in court on Friday, there has been at least two additional episodes of violence at MDC. Undersigned counsel submits that the foregoing supplement obviates the need to continue to quibble about the value of land and allows the court to reach an expeditious decision. The additional sureties plan to be on the telephone at today's hearing.

The supporting documentation has been provided to the government and Court via email, but will not be filed on ECF because of the private information contained therein.

Sincerely,

/s/

Ronald S. Sullivan Jr.

cc: government